

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Ericka Khounedaleth,

Case No. 20-cv-02325 (WMW/BRT)

Plaintiff,

v.

City of Minneapolis, a municipal entity;
Officer Doe #1, in their individual and
official capacity; Officer Doe #2, in their
individual and official capacity,

JOINT STIPULATION

Defendants.

IT IS HEREBY STIPULATED AND AGREED by and between the parties as follows:

WHEREAS, Defendant City of Minneapolis (“Defendant”) made a Rule 68 Offer to Plaintiff in the amount of \$7,500.00; Plaintiff accepted the offer and Judgment was entered accordingly on April 1, 2022; and

WHEREAS, the parties have reached a tentative settlement regarding Plaintiff’s attorney’s fees, expenses, and costs which would render Plaintiff’s motion for attorney’s fees, expenses, and costs unnecessary; and

WHEREAS, Defendant needs to seek approval of the tentative settlement by the Minneapolis City Council before entering into a binding settlement, and the City Council will not be able to approve the proposed settlement until its April 28 meeting (subject to Mayoral approval); and

WHEREAS, both parties wish to avoid unnecessary legal expenses related to a motion and petition for attorney fees, expenses, and costs if settlement relating to Plaintiff's attorney's fees, expenses, and costs is approved by the Minneapolis City Council on April 28, 2022 (subject to Mayoral approval).

WHEREAS, Defendant has agreed to extend the deadline for Plaintiff to file a motion for attorney's fees, costs, and expenses related to this matter until May 19, 2022, (21 days after the April 28, 2022, City Council meeting), in hopes and anticipation that this matter will be able to be resolved at the Council meeting and subsequent Mayoral approval period.

ACCORDINGLY, the parties respectfully request that the Court issue an Order extending the deadlines under the Federal Rules of Civil Procedure and the Local Rules of Practice to allow Plaintiff to file her motion for attorney's fees, costs, and expenses on or before May 19, 2022, and for it to be considered timely filed if filed on or before that date.

Dated: April 5, 2022

/s/ Nico Ratkowski
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Dated: April 5, 2022

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